



P.O. Box 38800 • Tucson, Arizona 85738-8800

Office: Suite 200, 85712

January 15, 2021

Pima County Department of Environmental Quality
Attn: Jacqueline Ronstadt, Air Compliance Manager
150 W Congress St, Suite 109
Tucson AZ 85701

Dear Ms. Ronstadt,

Tucson Iron and Metal (TIM) is providing this excess emissions report in accordance with the requirements of General Conditions 11.a.i.(a).(ii) and 11.a.i.(b) of Pima County Department of Environmental Quality (PDEQ) Air Quality Permit #127.

1. Identity of each stack or other emission point where the excess emissions occurred

Excess emissions occurred from TIM Other Solid Waste Incinerator (OSWI) unit from the feed end of the incinerator tube, and from the main stack

2. Magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions

Excess emissions emanating from the feed opening of the OSWI unit did not pass through the CEMS, so no data regarding emissions is available. A Method 9 reading was not taken as the operator was engaged in trying to find and repair the cause of the excess emissions. Emissions did not cross property lines.

3. Date, time and duration or expected duration of the excess emissions

Excess emissions occurred on January 12, 2021 beginning around 1:30pm and were controlled by approximately 2:30pm

4. Identity of the equipment from which the excess emissions emanated

Excess emissions emanated from the feed end of the incinerator tube to TIM OSWI unit and the main stack of the TIM OSWI unit

5. Nature and cause of the emissions

The nature of the excess emissions was visible smoke and excess CO @7%O2 emissions. The excess emissions were caused by the failure of the baghouse air compressor.

6. *If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions*

The baghouse air compressor failed due to an electrical short. The wires were repaired by the operator upon finding the cause of the malfunction. On January 13, the wires were inspected by TIM's mechanic and insulated to prevent the recurrence of this malfunction.

7. *The steps that were or are being taken to limit the excess emissions; If the excess emissions resulted from start-up or malfunction, the report shall contain a list of the steps taken to comply with permit procedures.*

Once excess emissions began, the OSWI unit operator

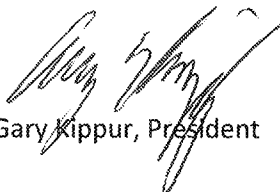
- a. Stopped the contraband feed to begin the shutdown process;
- b. Checked the afterburner chamber operating temperature;
- c. Checked for baghouse system malfunction – noticed that the magnahelic was climbing;
- d. Attempted to pulse the bags;
- e. Performed a series of tests to try to pulse the bags again;
- f. Continued to investigate why the bags would not pulse – found the air compressor was not running;
- g. Proceeded to conduct necessary repairs to get the air compressor started again.

Once the operator was able to restart the air compressor, excess emissions stopped.

Closing:

I am the Responsible Official (R.O.) for Tucson Iron & Metal and I certify that this excess emissions report pursuant to General Condition 11.a.i.(a).(ii). of PDEQ Air Quality Permit #127, to the best of my knowledge, is true, accurate and complete. If you have any questions or comments regarding this response to your inquiries, please contact me at 520-884-1554.

Regards,



Gary Kippur, President